

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

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BABY DOE, A CITIZEN OF AFGHANISTAN	:	
CURRENTLY RESIDING IN NORTH	:	CIVIL ACTION NO. 3:22-CV-49
CAROLINA, BY AND THROUGH NEXT	:	
FRIENDS, JOHN AND JANE DOE; AND JOHN	:	
AND JANE DOE, CITIZENS OF AFGHANISTAN:	:	
AND LEGAL GUARDIANS OF BABY DOE,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JOSHUA MAST, STEPHANIE MAST, RICHARD	:	
MAST, KIMBERLEY MOTLEY, AND AHMAD	:	
OSMANI,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
UNITED STATES SECRETARY OF STATE	:	
ANTONY BLINKEN AND UNITED STATES	:	
SECRETARY OF DEFENSE GENERAL	:	
LLOYD AUSTIN,	:	
	:	
Nominal Defendants.	:	

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DOE PLAINTIFFS' MOTION TO SEAL AMENDED COMPLAINT AND EXHIBIT

Plaintiffs, by counsel, respectfully move for leave to file their unredacted Amended Complaint and Exhibit 1 thereto under seal, pursuant to Local Civil Rule 9 and this Court's Protective Order (ECF No. 26). The unredacted Amended Complaint and Exhibit 1 thereto are being filed electronically with the Court contemporaneously herewith, as required by Local Civil Rule 9. As further grounds for this motion, Plaintiffs refer to the Memorandum in Support of this

Motion, filed contemporaneously herewith. A proposed Order is attached as Exhibit A to this Motion.

Dated: October 28, 2022

Respectfully submitted,

/s/ Maya Eckstein

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of October 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

By: /s/ Maya M. Eckstein
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